



40 Paterson Street
New Brunswick, NJ 08901
Tel: (732) 545-4717 Fax: (732) 545-4579
www.hoaglandlongo.com

Benjamin H. Haftel
Of Counsel
bhaftel@hoaglandlongo.com

March 4, 2019

VIA ECF

Hon. Steven C. Mannion, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 5060
Newark, New Jersey 07101

Re: Armstrong v. Andover Subacute & Rehab Center Services One, Inc., et al.
Civil Action No. 2:12-CV-3319-SDW-SCM

Dear Judge Mannion:

This firm represents Defendant Sanjay K. Jain, M.D. in the above referenced action. On February 25, 2019, Your Honor presided over a scheduling conference with regard to the above-reference matter and then issued an Order memorializing Your Honor's decisions regarding discovery deadlines. Paragraph 4.a. currently has the affirmative expert reports to be served ahead of the responding expert reports. See Exhibit A, p.2. After conferring with all counsel, it is our collective belief that the deadlines set forth in Paragraphs 4.a. and 4.b. were inadvertently entered in error. We would respectfully request that the Order be corrected to provide for the service of all affirmative expert reports to be served by May 31, 2019, with the responding expert reports to be served due on or before July 19, 2019.

Thank you for Your Honor's anticipated courtesy and cooperation with regarding to this request. Should Your Honor have any questions, we will gladly set up another telephone conference to address this issue.

Respectfully Yours,

BENJAMIN H. HAFTEL

BHH:stc
cc: All Counsel of Record (via ECF)

SO ORDERED

s/Steven C. Mannion

Steven C. Mannion, U.S.M.J.

Date: 3/5/19.